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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL J. SOLOMON,

Defendant.

2:11 - CR-00383-LDG-PAL

DEFENDANT SOLOMON'S MOTION
FOR COURT RECOMMENDATION
FOR DESIGNATION OF FEDERAL
CORRECTIONAL FACILITY

COMES NOW, Defendant, DANIEL J. SOLOMON, by and through his attorney, JACK E. BUCHANAN, ESQ., and herewith files this Motion for Court Recommendation for Designation of Federal Correctional Facility requesting this Honorable Court to recommend a specific Federal Bureau of Prisons facility for Defendant to complete his 15 month sentence that was given to him on May 11, 2015, before this Honorable Court.

That, at the time of the filing of Defendant's Sentencing Memorandum and with the uncertainty of the eventual prison sentence, Defendant failed to express to the Court his request for any prison sentence, if imposed, to be fulfilled at a specific facility. Defendant, within 24 hours of his sentence, has made arrangements to permanently transfer his place of residence back to his home State of Pennsylvania upon completion of his prison term. Defendant represented to

1 this Honorable Court on May 11, 2015 that he has very little ties to the Las Vegas community
 2 and that both his parents and immediate family live in Pennsylvania. Defendants father, age 93
 3 who has early onset dementia and his mother, age 83, who is scheduled to have surgery in the
 4 coming months, would be significantly burdened arranging travel outside of a reasonable vicinity
 5 of their residence, especially one near Las Vegas, Nevada. Defendant also has two sisters and
 6 two brothers with them also residing in Pittsburgh, Pennsylvania. That family support has
 7 always been of the utmost importance to Defendant and that Defendant has no other immediate
 8 family in any other place of the United States. Accordingly, Defendant is requesting this Court
 9 recommend to the Federal Bureau of Prisons that Defendant be permitted to serve his sentence at:

10 **Federal Correctional Institute Morgantown**

11 **446 Greenbag Road, Rt. 857, Morgantown, West Virginia 26501**

12 Being housed at that prison would enable his ailing mother and father the capability to be able to
 13 visit with Defendant as much as they can, especially his mother and father while their health is
 14 still manageable. Said prison designation is approximately 80 miles from Defendant's future
 15 home residence in Pittsburgh, PA upon release, and also from Defendants parents residence.

16 **CONCLUSION**

17 Defendant fully understands that he can be sent to any federal prison in the United States
 18 and that determination rests solely with the Federal Bureau of Prisons, however, Defendant
 19 would request this Court place into his Judgment a recommendation that Defendant be sent to
 20 **FCI Morgantown, 446 Greenbag Road, Rt. 857, Morgantown, West Virginia 26501.**

21
 22 DATED this 13th day of May, 2015.

23
 24 ORDER

25 IT IS SO ORDERED.

26 DATED this 15th day of May 2015.

27 Lloyd D. George

28 Sr. U.S. District Judge

/Jack E. Buchanan/

JACK E. BUCHANAN, ESQ.

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Attorney for Defendant